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April 11, 2024

Via Electronic Filing

Honorable Margaret M. Garnett
United States District Court
Southern District of New York
40 Foley Square, Room 906
New York, New York 10007

**Re: Milwaukee Electric Tool Corporation v Maersk A/S
Case No. 1:24-cv-1418-MMG
Letter Motion for Adjournment of Pretrial Conference**

Dear Judge Garnett

Plaintiff Milwaukee Electric Tool Corporation (hereinafter "Plaintiff"), by and through undersigned counsel, respectfully submits this letter motion pursuant to Section B.5 of Your Honor's Individual Practices to request adjournment of the Pretrial Conference in this matter. In support thereof, Plaintiff respectfully shows as follows:

Plaintiff's Complaint was filed on February 23, 2024. Doc. 1. This Honorable Court issued a Notice of Pretrial Conference on February 29, 2024. Doc. 3. Defendant Maersk A/S (hereinafter "Defendant"), through counsel William J. Pallas of Freehill Hogan & Mahar LLP, has agreed to waive formal service of the Summons and Complaint. A copy of the waiver of service of summons will be filed on ECF shortly. The parties anticipate that Defendant will file an answer on or before June 10, 2024 under the Federal Rules of Civil Procedure.

In addition, counsel for Plaintiff and Defendant are in discussions to attempt to negotiate a pre-answer resolution of the matter, including the voluntary exchange of informal discovery and documentation. In pursuit of those good faith discussions, Plaintiff requests that the initial Pretrial Conference in this matter be adjourned from its present date of April 18, 2024 to a date after June 10, 2024, consistent with the anticipated Answer date.



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This is the first request to adjourn the Preliminary Conference. Respectfully, there are no current Court dates, appearances, or deadlines (other than those identified in this letter) which will be impacted by the requested extensions. The request is made not for the purposes of delay, but in good faith so that the parties may have additional time to attempt to resolve the pending dispute(s), either in whole or in part.

In advance, we thank the Court for its consideration of the request.

Respectfully submitted,

Chalos & Co, P.C.

Briton P. Sparkman

cc: Via Email

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Counsel for Defendant Maersk A/S

GRANTED. The Initial Pretrial Conference in this matter is hereby adjourned to **Thursday, June 27 at 9:30 a.m.** The deadline for the parties to submit their joint letter and a Proposed Civil Case Management Plan and Scheduling Order is hereby extended to **June 20, 2024**. If this case has been settled or otherwise terminated, counsel are not required to submit such a letter or to appear, provided that a stipulation of discontinuance, voluntary dismissal or other proof of termination is filed on the docket prior to the date of the conference, using the appropriate ECF Filing Event.

SO ORDERED. Dated April 15, 2024.

**HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE**